**Amendments to the Drawings:**

Applicant requests that FIGS. 1B, 2, and 5B be replaced with the attached replacement sheets for FIGS. 1B, 2, and 5B. Applicant also includes annotated sheets for FIGS. 1B, 2, and 5B to show changes — namely, removing labels 152, 160, 212, 214, 534, 536, and 542.

Attachments: Replacement sheets for FIGS. 1B, 2, and 5B.

Annotated sheets for FIGS. 1B, 2, and 5B showing changes.

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## REMARKS

In the Office Action mailed June 29, 2006, the Examiner objected to the drawings; rejected claim 13 under 35 U.S.C. §112, first paragraph for enablement; rejected claims 1-8, 10-11, 13-14, and 17-19 under 35 U.S.C. §112, second paragraph; rejected claims 9-14 under 35 U.S.C. §101 as failing to provide a useful, concrete, tangible result; rejected claims 1-6, 8-10, 12, 15, and 16 under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 6,216,131 to Liu et al. (Liu); rejected claims 7 and 17-20 under 35 U.S.C. §103(a) as unpatentable over Liu in view of U.S. Patent Publication No. 2002/0174098 to Wu et al. (Wu); rejected claim 11 under 35 U.S.C. §103(a) as unpatentable over Liu in view of Wu and further in view of U.S. Patent No. 6,510,350 to Steen; and rejected claim 14 under 35 U.S.C. §103(a) as unpatentable over Liu in view of U.S. Patent Publication No. 2003/0014420 to Jessee et al. (Jessee).

Claims 1-20 are currently pending.

By this Amendment, Applicant amends the specification; amends claims 1, 2, 5, 6, 9, 10, 11, 13, 17, 18, and 19 to more clearly define the features of the present invention; and submits replacement drawing sheets.

Regarding the objection to drawings, Applicant submits herewith replacement sheets for FIGs. 1B, 2, and 5B to remove labels 152, 160, 212, 214, 534, 536, and 542. Regarding label 100, Applicant has amended paragraph 0043 to correct a typographical error — replacing "100" with "110".

### 35 U.S.C. §112 Rejections

Regarding the rejection of claim 13 under 35 U.S.C. §112, first paragraph, Applicant submits that the amendments to claim 13 obviate the basis of the Examiner's

objection, and, as such, the rejection should be withdrawn.

Regarding the rejection of claims 1-8, 10-11, 13-14, and 17-19 under 35 U.S.C. §112, second paragraph, Applicant submits that the amendments to those claims obviate the basis for the Examiner's rejection, and, as such, the rejection should be withdrawn.

### 35 U.S.C. §101 Rejection

The Examiner rejected claims 9-14 under 35 U.S.C. §101. Applicant respectfully traverses this rejection.

Applicant submits that the claimed "machine-readable medium" does not claim non-statutory subject matter as alleged by the Examiner. Nonetheless, to expedite prosecution, Applicant amends the specification at paragraph 0060 to remove the subject matter describing "signal." Thus, the rejection under 35 U.S.C. §101 should be withdrawn.

### 35 U.S.C. §102(e) Rejection

The Examiner rejected claims 1-6, 8-10, 12, 15, and 16 under 35 U.S.C. §102(e) as anticipated by Liu. Applicant respectfully traverses this rejection.

Claim 1 defines a computer implemented method including, among other things, "a mapping engine configured to select a source domain from the plurality of databases, generate a mapping of at least one value from the source domain to another value in at least one target domain from the plurality of databases based on the object that is common to the at least one value in the source domain and the other value in the at least one target domain, generate the table to represent the mapping, and apply the mapping for a user-initiated change to the table via the graphical user interface."

The Examiner alleges that Liu at col. 2, lines 56-65 and col. 3, lines 2-28 disclose

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the above noted feature of Liu. Rather than disclose a mapping engine operative with a plurality of "databases" as required by claim 1, Liu merely discloses mapping "data sets" from one device to another, and a data set does not constitute a database. Liu col. 2, lines 56-65 and col. 3, lines 2-28. Indeed, nowhere does Liu's disclosure mention the term "database." Because Liu discloses the use of datasets rather than databases, Liu fails to disclose at least "a mapping engine configured to select a source domain from the plurality of databases, generate a mapping of at least one value from the source domain to another value in at least one target domain from the plurality of databases based on the object that is common to the at least one value in the source domain and the other value in the at least one target domain," as recited in claim 1. Therefore, the rejection under 35 U.S.C. §102(e) of claim 1 and claims 2-6 and 8, at least by reason of their dependency from independent claim 1, should be withdrawn.

Claim 9 recites a combination including, among other things, the following feature: "presenting values ... the graphical user interface interacts with a mapping engine that maintains mappings of the first and second values from one or more databases." Because Liu discloses the use of data sets rather than databases, Liu fails to disclose at least this noted feature. Therefore, the rejection under 35 U.S.C. §102(e) of claim 9 and claims 10 and 12, at least by reason of their dependency from independent claim 9, should be withdrawn.

Claim 15 recites a combination including, among other things, the following feature: "mapping a plurality of related values in different domains in a common row, wherein the value mapping table presents an overview of mapped values in the graphical user interface, wherein the plurality of related values reside in one or more databases." For the reasons given above, Liu fails to disclose at least this feature.

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Therefore, the rejection under 35 U.S.C. §102(e) of claim 15 and claim 16, at least by reason of its dependency from independent claim 15, should be withdrawn.

### 35 U.S.C. §103(a) Rejection of Claims 7 and 17-20

The Examiner rejected claims 7 and 17-20 under 35 U.S.C. §103(a) as unpatentable over Liu in view of Wu. Applicant respectfully traverses this rejection.

Claim 7 depends from claim 1 and includes all the features therein including, among other things, "a mapping engine configured to select a source domain from the plurality of databases, generate a mapping of at least one value from the source domain to another value in at least one target domain from the plurality of databases based on the object that is common to the at least one value in the source domain and the other value in the at least one target domain, generate the table to represent the mapping, and apply the mapping for a user-initiated change to the table via the graphical user interface." As noted above with respect to claim 1, Liu fails to disclose this feature.

Wu discloses a database migration system. Specifically, Wu states:

> [0004] An object of this invention is to provide a database management system which integrates the original data sources operating under different Application Program Interface (API) (e.g., ORACLE, SYBASE, MS SQL, IBM DB2, etc.) and **transforms these data sources into text files** (e.g., EXCEL, XML, WML format) for utilization by different application systems (e.g., IE Browser, Netscape, EXCEL, WAP phone, EOS, or POS in enterprises) via different transmission interfaces (Internet, Intranet, Mobile network) so as to meet the requirements of electronic commerce.

Wu, paragraph 0004. The above passage confirms that Wu is not operative to perform mapping between databases, but rather using a single database management system to map from data sources to text files as well as facilitate transmission for electronic commerce. Accordingly, Wu fails to disclose "a mapping engine" as claimed. Because

neither <u>Liu</u> nor <u>Wu</u> discloses or suggest "a mapping engine" as claimed, the rejection of claim 7 under 35 U.S.C. §103(a) should be withdrawn.

Claim 17 as well as claims 18-20 depend from claim 16 and includes all the features therein including, among other things, "mapping a plurality of related values in different domains in a common row, wherein the value mapping table presents an overview of mapped values in the graphical user interface, wherein the plurality of related values reside in one or more databases." For the reasons given above with respect to claim 7, <u>Liu</u> and <u>Wu</u>, whether taken alone or in combination, fail to disclose or suggest the noted feature of claims 17-20, and the rejection of those claims under 35 U.S.C. §103(a) should thus be withdrawn.

Regarding claim 17, the Examiner alleges that <u>Wu</u> FIG. 12B discloses searching the value mapping table and displaying the results in the user interface. However, <u>Wu</u> at FIG. 12B discloses (as described by the Examiner) using a graphical user interface to invoke an SQL query. But invoking an SQL query does not constitute a text search of a mapping table. As such, Wu fails to disclose or suggest the following feature of claim 17: "searching for the entry with a search engine to locate the entry in the value mapping table." For this additional reason, the rejection of claim 17 under 35 U.S.C. §103(a) should thus be withdrawn.

Moreover, the Examiner appears to allege that even though <u>Liu</u> lacks many of the claimed features, one of ordinary skill would be motivated to combine <u>Liu</u> with <u>Wu</u>. Other than using impermissible hindsight, the Examiner has failed to show a motivation to combine from the references themselves, rather than the Applicant's disclosure. Applicant submits that the Examiner has not satisfied the initial burden of factually supporting a *prima facie* case of obviousness (see M.P.E.P. § 2142).

According to M.P.E.P. § 2142, the Examiner must establish three criteria to make a prima *facie* case of obviousness. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. In this case, the Examiner appears to use hindsight, as noted above, since Applicant fails to comprehend why a skilled artisan would be motivated to combine the disparate teachings of Liu's system for mapping data between devices (e.g., between personal organizers) and Wu's real-time exchange system. Second, there must be a reasonable expectation of success. The Examiner has failed to show whether such a rube Goldberg combination could be made operative (and Applicant doubts such a combination is even possible). Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. As noted above, the references whether taken alone or in combination fail to teach each and every element of the claims rejected under section 103. Applicant submits that the Examiner has failed to establish each of these three criteria and has, thus, failed to support a *prima facie* case of obviousness. Absent such support, the rejections under 35 U.S.C. §103(a) should be withdrawn for this additional reason.

### 35 U.S.C. §103(a) Rejection of Claim 11

The Examiner rejected claim 11 under 35 U.S.C. §103(a) as unpatentable over Liu in view of Wu and further in view of Steen. Applicant respectfully traverses this rejection.

Claim 11 depends from claim 9 and includes all of the features therein including, among other things, "presenting values of two or more domains in a side-by-side representation ... wherein the graphical user interface interacts with a mapping engine

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that maintains mappings of the first and second values from one or more databases."
For the reasons noted above, neither Liu nor Wu disclose or suggest this noted feature
of claim 11. Although Steen discloses a monitoring and control system for remote
equipment, Steen fails to cure the noted deficiencies of Liu and Wu. Accordingly, Liu,
Wu, and Steen, whether taken alone or in combination, fail to disclose or suggest the
noted feature of claim 11, and the rejection of claim 11 under 35 U.S.C. §103(a) should
thus be withdrawn.

Once again the Examiner has failed to satisfy the initial burden of factually
supporting a *prima facie* case of obviousness (see M.P.E.P. § 2142). In this case, the
Examiner appears to use hindsight, since Applicant fails to comprehend why a skilled
artisan would be motivated to combine the disparate teachings of Liu and Wu with
Steen's system for monitoring and control of remote equipment. Second, the Examiner
has failed to show whether such a three-way contraption could be made operative (and
Applicant doubts such a combination is even possible). Finally, as noted above, the
references whether taken alone or in combination fail to teach each and every element
of the claims rejected under section 103. The rejection of claim 11 under 35 U.S.C.
§103(a) should be withdrawn for this additional reason.

### 35 U.S.C. §103(a) Rejection of Claim 14

The Examiner rejected claim 14 under 35 U.S.C. §103(a) as unpatentable over
Liu in view of Jessee. Applicant respectfully traverses this rejection.

Claim 14 depends from claim 9 and includes all of the features therein including,
among other things, "presenting values of two or more domains in a side-by-side
representation ... wherein the graphical user interface interacts with a mapping engine
that maintains mappings of the first and second values from one or more databases."

For at least the reasons noted above, Liu fails to disclose or suggest this noted feature. Although Jessee discloses an analysis system for data that allows moving rows and columns of tabular data, Jessee fails to cure the noted deficiencies of Liu. Therefore, Liu and Jessee, whether taken alone or in combination, fail to disclose or suggest the noted feature of claim 14, and the rejection of claim 14 under 35 U.S.C. §103(a) should be withdrawn.

Yet again the Examiner has failed to satisfy the initial burden of factually supporting a *prima facie* case of obviousness (see M.P.E.P. § 2142). In this case, the Examiner appears to use hindsight offering no support from the references themselves. Moreover, Applicant submits that a skilled artisan would not be motivated to modify Liu with a very different type of system, such as Jessee's data analysis system. Second, the Examiner has failed to show whether such a disparate combination could be made operative. Finally, as noted above, Liu and Jessee, whether taken alone or in combination, fail to teach each and every element of the claims rejected under section 103. The rejection of claim 14 under 35 U.S.C. §103(a) should be withdrawn for this additional reason.
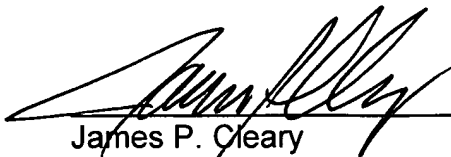
## CONCLUSION

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below. Applicants are concurrently filing herewith a Petition for a one month extension of time with the requisite fee. Enclosed herewith is a check for $120.00 to reply the previous office action. The Commissioner is hereby authorized to charge any additional fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-067.

Respectfully submitted,

Date:_9/28/06_

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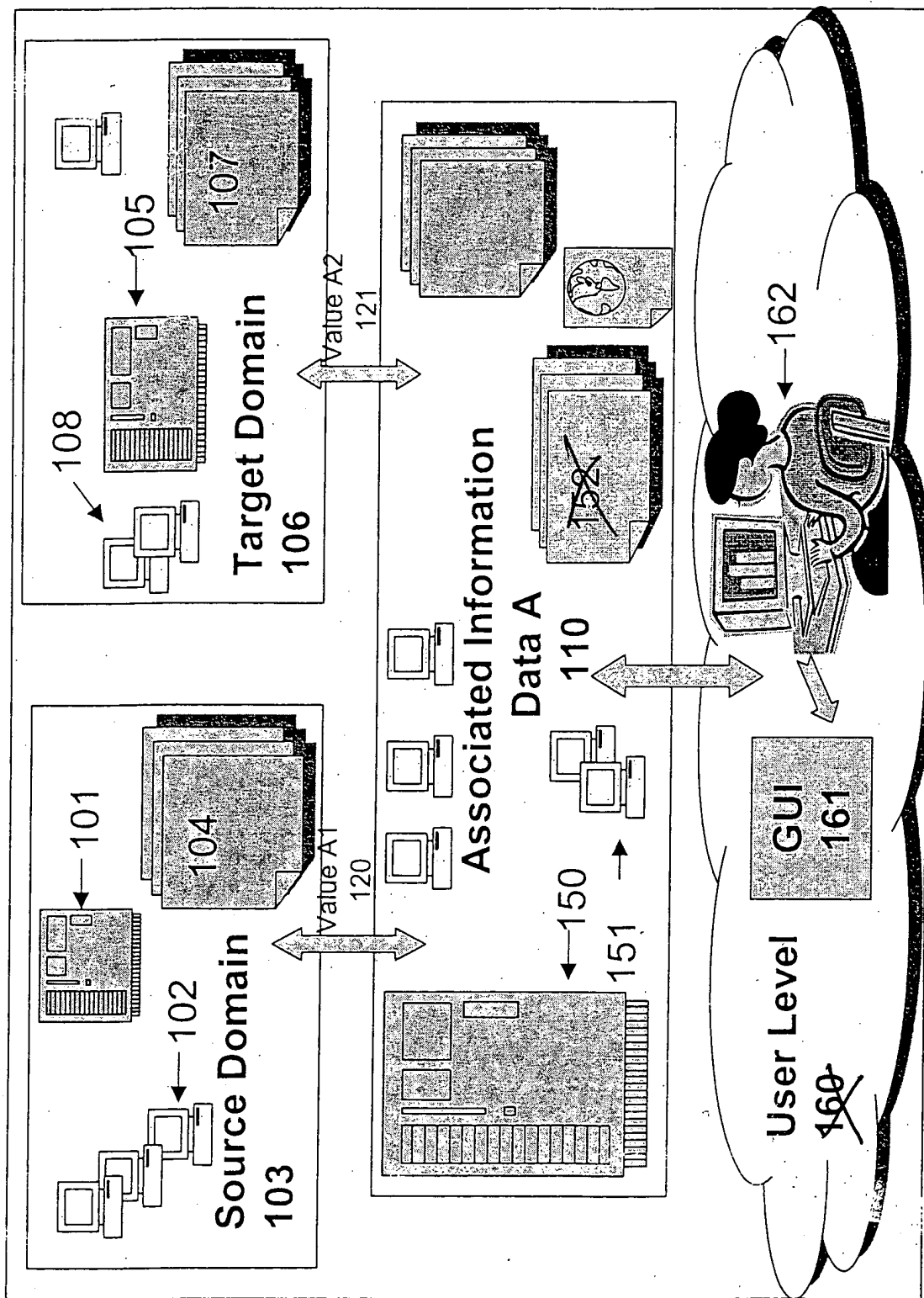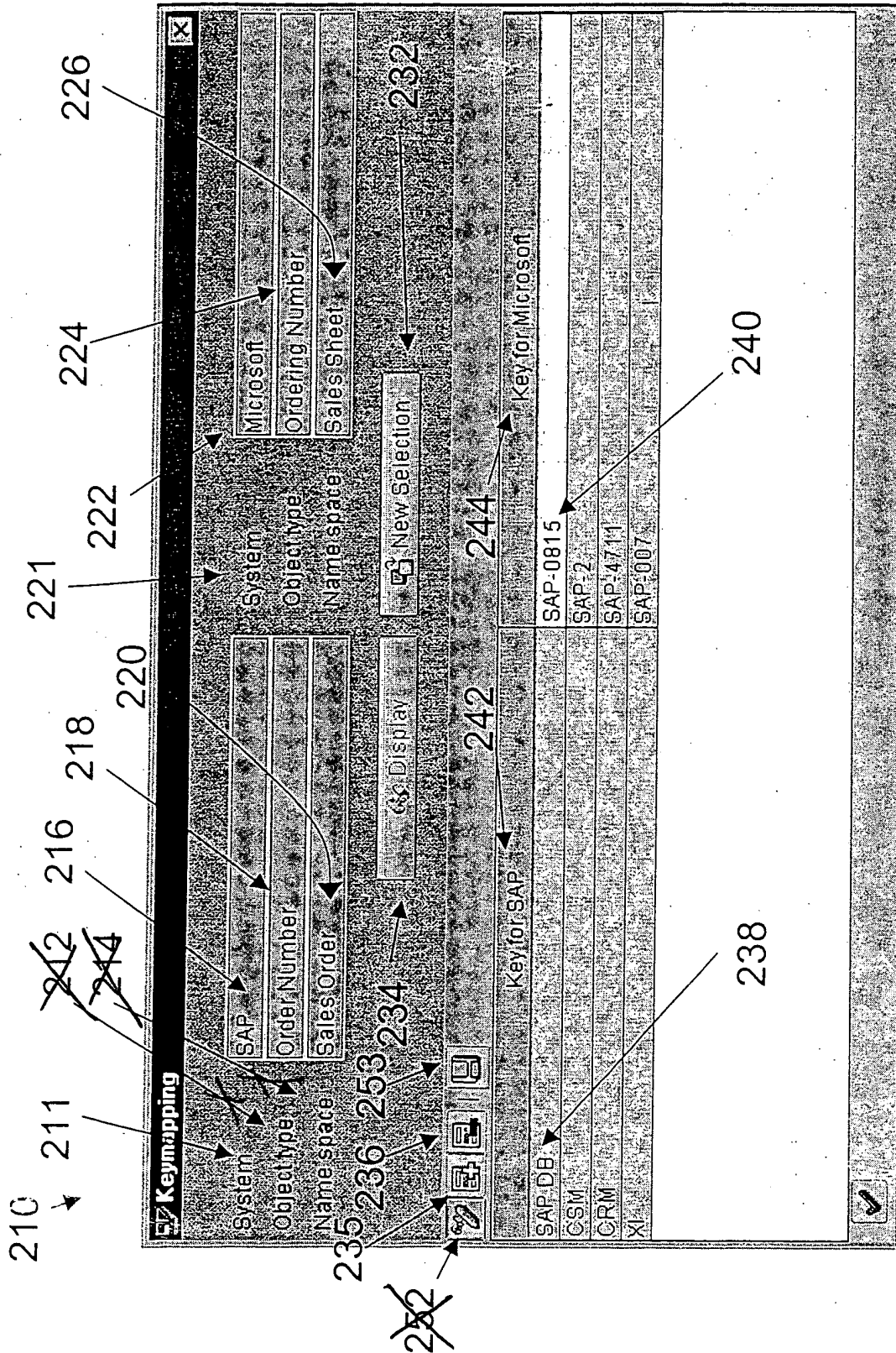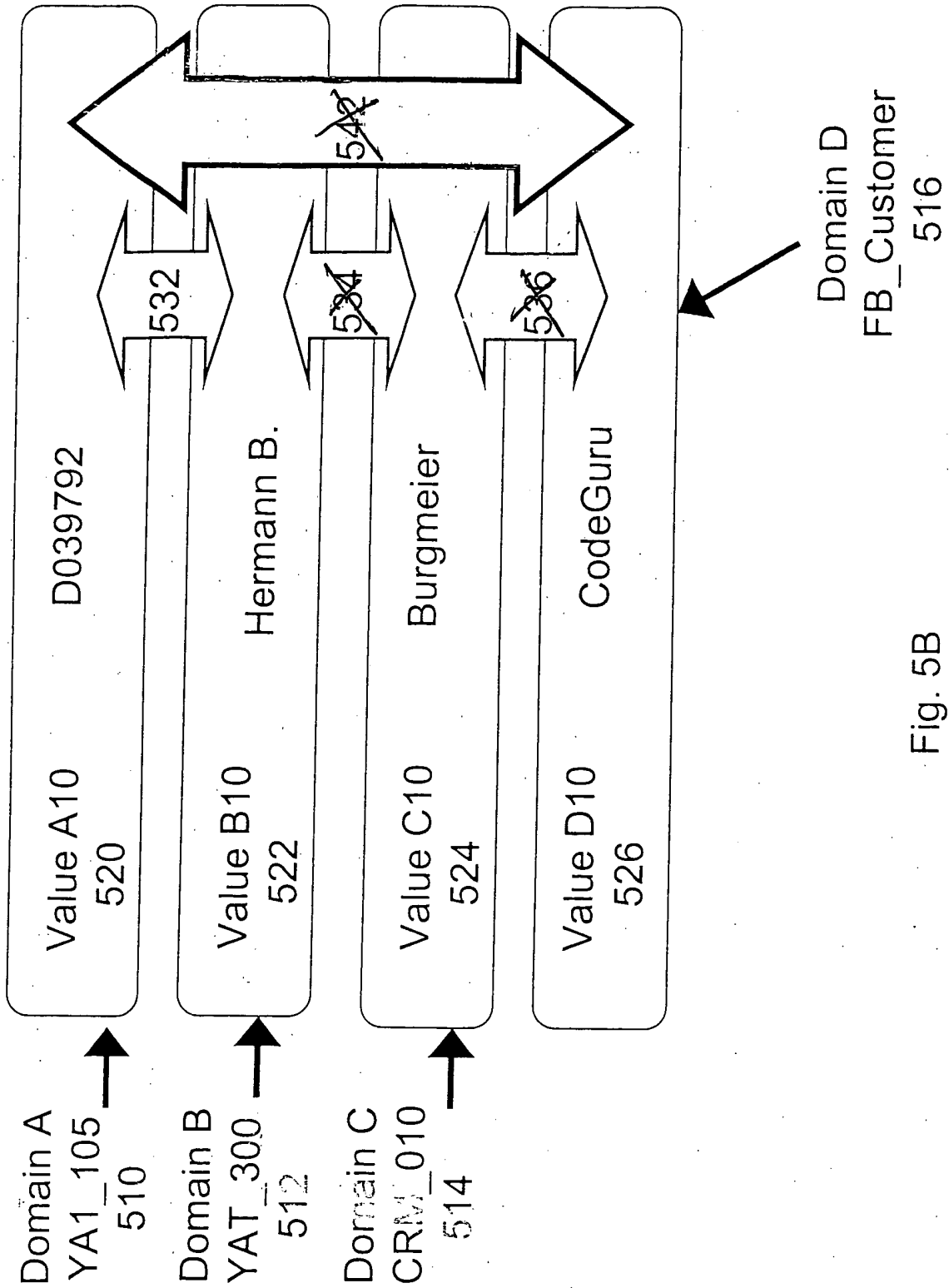Tel.: 858/320-3031 Fax: 858/320-3001

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Fig. 1B

Applicant(s): Hermann Burgmeier
VALUE MAPPING



Fig. 2

Fig. 5B